

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
EASTERN DIVISION AT JACKSON**

UNITED STATES OF AMERICA)	
)	
v.)	CASE NO. 1:19-cr-10042 STA
)	
THOMAS KELLEY BALLARD, III,)	
Defendant.)	

MOTION TO CONTINUE SENTENCING

Comes now Leslie I. Ballin who files this Motion to Continue the Sentencing Hearing of September 21, 2021 for thirty (30) days and in support would show as follows:

That on September 14, 2021, Counsel became aware of issues existing in the attorney/client relationship that were previously unknown to counsel.

That for legal and ethical consideration, Counsel needs to resolve these issues before sentencing.

That Counsel acknowledges that the issues referred to, have not be addressed with specificity.

That Counsel submits that the lack of specificity is intentional and appropriate under the circumstances.

That Counsel spoke to AUSA Emily Petro who advises that the government takes no position regarding this request.

WHEREFORE, PREMISES CONSIDERED, Counsel prays that the Sentencing

hearing in this matter set on September 21, 2021 be continued thirty (30) days for the reasons set out herein above.

Respectfully submitted,

BALLIN, BALLIN & FISHMAN, P.C.

/s/ Leslie I. Ballin
Leslie I. Ballin (Tenn. BPR #5605)
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Attorney for Defendant

CERTIFICATE OF CONSULTATION

I, Leslie Ballin, attorney for Defendant, hereby certifies that I have consulted with AUSA Emily Petro regarding this request and have been advised that the Government takes no position regarding this request.

/s/Leslie I. Ballin

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon all interested parties via electronic mail on this the 14th day of September, 2021.

/s/ Leslie I. Ballin